



External Meeting Request Form for Tomas Carbonell

Today's Date: February 17, 2021

Requesting Organization: Van Ness Feldman on behalf of Orsted Wind Power North America LLC (Orsted)

Title of the Meeting: OCS Air Permitting for Offshore Wind Projects

Purpose: To discuss the applicability of the air permitting requirements to pull-ahead cable-laying vessels in the development of offshore wind projects on the Outer Continental Shelf.

Background: As a general matter, the new source review (NSR) permitting requirements apply to the construction and operation of offshore wind projects located on the OCS. Over the last year, Orsted has been working with EPA to address whether and how these NSR requirements should apply to pull-ahead cable-laying vessels (CLVs) in the development of these offshore projects. Orsted and other developers must use CLVs to install offshore electric transmission cables connecting these new offshore wind farms on the OCS to landfall locations where the cables connect to onshore substations and related infrastructure. Needless to say, this is a complicated issue of first impression for which Orsted is seeking the policy and regulatory guidance of EPA headquarters. We believe EPA guidance on the CLV air permitting issue is necessary to assure consistency among the EPA regions and expedite the issuance of OCS NSR permits for offshore wind projects along the Atlantic seaboard. In the case of Orsted alone, we are now in the process of developing offshore wind farms for South Fork Wind, Ocean Wind, Revolution Wind, Sunrise Wind, and Skipjack Wind.

Is this meeting related to ongoing litigation: No

Earliest possible date for the meeting: Monday, February 22, 2021

Last possible date for the meeting: Friday, March 12, 2021

Is the meeting urgent and if so, why: This matter involves an important permitting issue that must be resolved in order to move forward on pending air permit applications for offshore wind projects as well as many other offshore wind projects that are now under development and must quickly secure the necessary NSR permits for expeditiously deploying significant amounts of new wind generation resources on the OCS.

Requested Time Length: 1 hour

Have you met with anyone within EPA: Yes. Orsted met last fall with OAQPS staff in RTP North Carolina, including Raj Rao, Juan Santiago, and Jessica Montanez as well as staff from various EPA Regions, and the Office of General Counsel. Attached hereto for your reference is a detailed regulatory

analysis that Orsted submitted early last fall to EPA on these key air OCS permitting issues. There are other written materials addressing the CLV permitting issue that we have shared with EPA staff, including a PowerPoint presentation used for the teleconference, which we can make available to you as appropriate.

Invitees: Tomas Carbonell and other appropriate EPA staff.

External Participants: Stephen Fotis, Van Ness Feldman; Britt Fleming, Van Ness Feldman; Bryan Stockton, Orsted; Charles Scott, Orsted.

Teleconference Required: Yes

Video Conference Required: Not essential

Point of Contact for the Meeting: Stephen Fotis, Van Ness Feldman LLP, scf@vfn.com and (202) 413-2321.

Please email this form back to OAR_Invitations@epa.gov